

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

ATLAS DATA PRIVACY	)	Civil Action No. 3:24-cv-04104-
CORPORATION, JANE DOE-1,	)	MAS-TJB
JANE DOE-2, EDWIN	)	
MALDONADO, SCOTT	)	Electronically Filed
MALONEY, JUSTYNA MALONEY,	)	
PATRICK COLLIGAN, PETER	)	<b>NOTICE OF MOTION FOR <i>PRO</i></b>
ANDREYEV, and WILLIAM	)	<b><i>HAC VICE ADMISSION OF</i></b>
SULLIVAN,	)	<b><i>COUNSEL AND STATEMENT</i></b>
	)	<b><i>THAT NO BRIEF IS</i></b>
Plaintiff,	)	<b><i>NECESSARY</i></b>
	)	
v.	)	
	)	
6Sense INSIGHTS, INC., RICHARD	)	
ROES 1-10, fictitious names of	)	
unknown individuals and ABC	)	
COMPANIES 1-10, fictitious names of	)	
unknown entities,	)	
	)	
Defendant.	)	
	)	

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**PLEASE TAKE NOTICE** that Defendant, 6Sense Insights, Inc., by and through its counsel, Clark Hill, PLC, shall move before the Honorable Tonianne J. Bongiovanni, U.S.M.J. at the United States District Court for the District of New Jersey, Trenton Vicinage, 402 East State Street, Trenton, NJ 08608, for an Order granting the *pro hac vice* admission of Chirag H. Patel, Esq. and Myriah Jaworski, Esq., in accordance with Local Civil Rule 101.1(c), on a date to be determined by the Court.

**PLEASE TAKE FURTHER NOTICE** that the Defendant will rely upon the Declaration of Steven M. Richman, Esq., the Declaration of Chirag H. Patel, Esq., and the Declaration of Myriah Jaworski, Esq., which accompany this Motion.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**NO BRIEF OR ORAL ARGUMENT IS NECESSARY** in light of the nature of this Motion and the contents of the accompanying declarations. *See* L. Civ. R. 7.1(d)(4).

**CLARK HILL PLC**

By: /s/ Steven M. Richman  
Steven M. Richman

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*Attorneys for Defendant, 6Sense Insights, Inc.*

Dated: April 2, 2024

**CERTIFICATION OF SERVICE**

I hereby certify that on April 2, 2024, I caused to be served the foregoing Motion for Admission *Pro Hac Vice* upon all counsel of record via the Court's electronic filing system.

*/s/ Steven M. Richman*  
STEVEN M. RICHMAN